

1 Amy M. Samberg, NV Bar No. 10212
2 asamberg@fgppr.com
3 FORAN GLENNON PALANDECH
4 PONZI & RUDLOFF PC
5 400 East Van Buren Street, Suite 550
Phoenix, AZ 85004
Telephone: 602-926-9880
Facsimile: 312-863-5099

6 Dylan P. Todd, NV Bar No. 10456
7 dtodd@fgppr.com
8 Lee H. Gorlin, NV Bar No. 13879
lgorlin@fgppr.com
9 FORAN GLENNON PALANDECH
PONZI & RUDLOFF PC
10 2200 Paseo Verde Parkway, Suite 280
Henderson, NV 89052
Telephone: 702-827-1510
Facsimile: 312-863-5099

11 *Attorneys for Standard Fire Insurance
12 Company, erroneously named as The
Travelers Indemnity Company dba The
13 Travelers Home and Marine Insurance
14 Company*

15 **UNITED STATES DISTRICT COURT
16 DISTRICT OF NEVADA**

17 TAEKKEUN YOON, an individual; SU JUNG
18 KIM, an individual,

19 Plaintiffs,
20 v.

21 THE TRAVELERS INDEMNITY COMPANY,
22 dba TRAVELERS HOME AND MARINE
INSURANCE COMPANY, a Connecticut
Corporation; DOES I through XV, and ROE
23 Corporations I through X, inclusive,

24 Defendants.

CASE NO. 2:20-cv-01507-JCM-EJY

26 **STIPULATION AND ORDER
27 EXTENDING TIME FOR
DEFENDANT THE STANDARD FIRE
INSURANCE COMPANY TO FILE ITS
REPLY IN SUPPORT OF ITS MOTION
TO DISMISS [ECF NO. 6]**

28 IT IS HEREBY STIPULATED AND AGREED by Plaintiffs Taekkeun Yoon and Su Jung
Kim (“Plaintiffs”) and Defendant The Standard Fire Insurance Company (“Standard Fire”), by and

1 through their respective counsel, that the time for Standard Fire to file and serve its Reply in support
 2 of its Motion to Dismiss Plaintiffs' Complaint (ECF No. 6) be extended for two (2) weeks through
 3 and including Monday, November 2, 2020.

4 Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and Local Rule IA 6-1(a), Standard Fire represents
 5 that points and authorities presented in Plaintiffs' response require additional time to review and to
 6 present an adequate and thorough counter-argument and supporting authorities. Further, with the
 7 necessities of working remotely due to the ongoing COVID-19 pandemic, additional time is
 8 required for counsel to prepare its Reply and to obtain client review and approval of the Reply.

9 Accordingly, the Plaintiffs and Standard Fire hereby agree and stipulate to allow Standard
 10 Fire until November 2, 2020, to file its Reply in support of its Motion to Dismiss. Further, the
 11 parties respectfully request this honorable Court enter an Order providing the same.

12 DATED: October 16, 2020

13 THE LAW FIRM OF PARKE ESQUIRE

14
 15 By: /s/ Jose Valenzuela
 16 Jose E. Valenzuela III, Esq. (NV Bar No. 12510)
 V3Law, LLC
 17 4484 S. Pecos Rd., Ste. 140
 Las Vegas, NV 89121

18 Attorneys for Plaintiffs

19 DATED: October 16, 2020

20 FORAN GLENNON PALANDECH PONZI
 & RUDLOFF PC

21 By: /s/ Dylan P. Todd
 22 Amy M. Samberg (NV Bar No. 10212)
 23 400 E. Van Buren Street, Suite 550
 Phoenix, AZ 85004

24 Dylan P. Todd (NV Bar No. 10456)
 Lee H. Gorlin (NV Bar No. 13879)
 2200 Paseo Verde Parkway, Suite 280
 Henderson, NV 89052

25 Attorneys for Standard Fire Insurance
 Company, erroneously named as The
 Travelers indemnity Company dba The
 Travelers Home and Marine Insurance
 Company

26 IT IS SO ORDERED:

27 
 UNITED STATES DISTRICT JUDGE

28 DATED: October 19, 2020

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing **STIPULATION AND ORDER EXTENDING TIME FOR DEFENDANT THE STANDARD FIRE INSURANCE COMPANY TO FILE ITS REPLY IN SUPPORT OF ITS MOTION TO DISMISS [ECF NO. 6]** was served by the method indicated:

- BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
 - BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas, Nevada addressed as set forth below.
 - BY ELECTRONIC SERVICE:** submitted to the above-entitled Court for electronic service upon the Court's Registered Service List for the above-referenced case.
 - BY EMAIL:** by emailing a PDF of the document listed above to the email addresses of the individual(s) listed below.

DATED: October 16, 2020.

/s/ Darhyl Kerr
An Employee of Foran Glennon